

August 6, 2012

Mark Meunier  
Madison Kipp Corp.  
201 Waubesa Street  
Madison WI 53704

Subject: Final Approval: July 2012 Work Plan for Supplemental Polychlorinated Biphenyl  
Investigation: Madison Kipp Site

Dear Mr. Meunier:

Recent soil sampling efforts by Madison Kipp contractors have detected PCB contaminated soils on- and off-site to the north, south, east and west of the 201 Waubesa Street facility. In response to these detections, both the Department and USEPA have required additional site investigation work to better define the PCB related soil contamination. To meet this requirement, Madison Kipp submitted a supplemental work plan in July 2012. The Department and USEPA have reviewed the July 2012 Work Plan for Supplemental Polychlorinated Biphenyl Investigation. The following comments incorporate both the Department's and USEPA's reviews.

The proposed on-site sample locations are acceptable. The rectangular grid pattern will help define the extent of soil contamination in the area of borings B13, B15, B33 and B40. The grid spacing is acceptable at this time. If the additional data indicates the need for soil excavation as a remedial response, a tighter grid pattern may be necessary to better define the excavation limits prior to implementation.

The proposed line of borings along the property line will help determine the on-site contaminant distribution and the potential for additional off-site impacts. As proposed, the five foot sample spacing is acceptable. Depending upon the results of this work, additional off- site sampling on residential properties may be necessary.

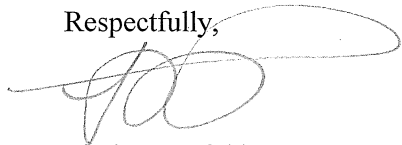
For both sets of samples the 0-2 and 2-4 foot sampling depths are acceptable. The use of USEPA SW-846 Method 8082 is an acceptable analytical choice. The soil samples will be tested for PCBs only. Also, the additional 2-4 foot samples at locations B13, B14, B15, B17 and B40 are approved.

Both agencies agree with the soil sampling conducted at 138 S. Marquette and 245 Waubesa Streets.

At this time the USEPA is applying a 1 part per million (ppm) total PCB soil cleanup standard for the on and off site properties. The Department is applying a .22 ppm total PCB standard to residential soils and .744 ppm industrial standard to on site soils. What remedial requirements these cleanup standards will dictate is unknown at this time. The final remedial options may be a combination of capping, land use restrictions, signage and excavation. At this time both agencies have a preference for excavation of more highly contaminated soils, while a risk based approach of capping and land use restrictions *may* be appropriate for lesser contaminated soils. It should be noted the USEPA rules have an "anti-dilution" provision in their excavation requirements. Excavated soils must be sent to a TSCA approved landfill if the source material has PCB concentrations greater than 50 ppm. The concentration in the excavated soils is not the deciding criteria; it is the source concentration that determines the landfill to be used.

This completes the Department review of the proposed workplan. If you have any comments or concerns about this review please contact me directly.

Respectfully,

A handwritten signature in dark ink, appearing to be 'LH', with a large loop at the end.

Linda Hanefeld  
Remediation and Redevelopment Team Supervisor  
South Central Region  
275-3310

cc: Mike Schmoller, SCR (file copy)  
David Crass, Michael Best and Friedrich  
Jennine Trask, Arcadis